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October 26, 2023

VIA ELECTRONIC FILING

Honorable Mary Kay Vyskocil,
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

USDC SDNY
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DOC #:
DATE FILED: 10/26/2023

Re: Erica Figueroa vs BJ's Wholesale Club Inc.
Docket No.: 22-CV-03906

Dear Judge Vyskocil,

We represent the plaintiff, Erica Figueroa, in the above referenced matter and write here on behalf of both parties to request an adjournment of today's status conference scheduled for 3:00pm before Your Honor.

Plaintiff's counsel advised the defendant this morning that the Plaintiff may be agreeable to stipulating as to a cap on damages and therefore remanding this matter back to state court for further proceedings. However, we require additional time to consult with our client and the parties need to enter an appropriate stipulated order to be submitted to the Court.

The parties jointly request that today's status conference be adjourned for reasons stated above. There have been no prior requests for an adjournment of this conference. Lastly, the parties apologize for the lateness of this request.

Your Honor's consideration of this matter is greatly appreciated

Respectfully submitted,
Michelle Jean-Jacques
Michelle Jean-Jacques, Esq.

cc: Daniel Velez, Esq.
Defendant's Attorney
Goldberg & Segalla

GRANTED. The parties are directed to file a joint status letter on or before October 30, 2023. The October 26, 2023 Status Conference is ADJOURNED to October 31, 2023 at 12:30 PM. SO ORDERED.

Date: 10/26/2023
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge